

Agency Letterhead

October 5, 2011

Dr. Allyson Brooks
Washington State Historic Preservation Office
Department of Archaeology and Historic Preservation
Re: Initiating Section 106 consultation process for the Georgetown Steam Plant Interim Action Project

Dear Dr. Brooks:

Pursuant to Section 106 of the National Historic Preservation Act (NHPA), the U.S. Environmental Protection Agency (EPA) is seeking to formally initiate the Section 106 consultation process with the Washington Department of Archaeology and Historic Preservation. Based on our understanding from discussions with the historic preservation consultant, EPA believes that the proposed Interim Action, described below, constitutes a federal undertaking, in accordance with 36 CFR 800, Protection of Historic Properties.

The Seattle City Light (SCL) property the Georgetown Steam Plant (GTSP) is a National Historic Landmark (NHL) and is part of the North Boeing Field/Georgetown Steam Plant site which is under a Model Toxics Control Act (MTCA) Agreed Order for investigation and cleanup. The Washington Department of Ecology (Ecology) issued a letter in 2010 requiring an interim action at the GTSP to remove sources of polychlorinated biphenyls (PCBs) that may have the potential to migrate offsite, enter The Boeing Company's storm drain system, and recontaminate Slip 4 following its remediation in 2011/2012. This direction was subsequently amended and Ecology has directed removal activities to occur during the 2011 construction season, permitting interim actions to occur simultaneously on GTSP and adjacent Boeing-leased properties during the regional dry season. This interim action will precede Ecology's full remedial investigation and feasibility study process for the North Boeing Field/GTSP MTCA site.

A number of chemicals other than PCBs also exceed interim action cleanup levels at various locations on the GTSP property. The objective of the interim action is to remediate soils containing PCBs and TPH to the extent practicable while addressing some of the interim action level exceedances of other chemicals.

Removal and management of soil with PCB concentrations greater than or equal to 50 mg/kg is regulated by the U.S. Environmental Protection Agency (EPA) under the Toxic Substances Control Act (TSCA). This work will be conducted in accordance with TSCA provisions for risk-based cleanup and disposal of PCB remediation waste [40 CFR § 761.61(c)]. The excavation and management of soils impacted by other chemicals, including PCBs at concentrations less than 50 mg/kg, will be conducted in accordance with MTCA.

This interim action is on a fast-track schedule so that the work can be completed in 2011. Design parameters in the interim action work plan are conceptual in nature and are subject to modification. Two figures showing the area of potential effect (APE) for the interim action are

attached. The APE includes areas of ground disturbing activity, as well as an adjoining staging area. The staging area is located west of the GTSP property (see shaded area on attached APE aerial map) and will be shared with an adjoining property operator (i.e., Boeing) who is also undertaking soil remediation in this area. The staging area is paved, and no ground disturbance is expected in that area. A combination of soil excavation (with offsite disposal) and capping is the proposed remedy to address soils containing elevated concentrations of PCBs, TPH, and other constituents at the GTSP. At this time, we seek Department of Archaeology and Historic Preservation concurrence with the proposed APE for this undertaking.

A cultural resources survey of the APE was performed. The survey included a field survey and effects analysis for buildings within the APE that are 50 years old or older, a pedestrian survey for archaeological resources, an analysis of the effects of project implementation on the plant building and associated resources of the GTSP, and construction monitoring. A treatment plan will be developed if any historic resources are discovered prior to or during project construction. We will provide the completed report to you and the National Park Service for comment as required under Section 800.10 of the NHPA, Special Requirements for Protecting National Historic Landmarks.

Seattle City Light and EPA are committed to meeting the full extent of NHPA while implementing a cleanup that will protect human health and the environment. Please do not hesitate to contact me at 206-553-2804 if you have any questions. Thank you for taking the time to review this project and we look forward to receiving your concurrence on the APE and any comments you have on the Cultural Resources Report.

Sincerely,

Dave Bartus
US EPA, TSCA Program

Cc: Mark Edens, Washington Department of Ecology
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